

April 3, 2020

**Patrick J. Kearns**  
619.881.3335 (direct)  
Patrick.Kearns@wilsonelser.com

Clerk of the Court  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

Re: *Airbus Helicopters, Inc. v. Riggs, et al.*  
Case No. 19-1158

Dear Clerk,

Pursuant to Supreme Court Rule 30.4, counsel for Respondents *Matthew Hecker, Daniel Friedman, Brenda Halvorson, Geoffrey Edlund, Elling B. Halvorson, John Becker, Elling Kent Halvorson, Lon A. Halvorson, Papillon Airways, Inc., d/b/a Papillon Grand Canyon Helicopters, and Xebec LLC*, in the matter designated above, hereby requests that the time within which to respond to the petition for certiorari be extended 30 days, to and including May 22, 2020. Consent was requested of counsel for the Petitioner Airbus Helicopters, Inc., who consented to this request for a 30-day extension. The petition for certiorari in the above-entitled case was docketed on March 20, 2020, after Justice Kagan granted Petitioner an extension from February 19, 2020 to March 20, 2020. Absent an extension, the Brief in Opposition would be due April 22, 2020.

This request will not prejudice Petitioner's interests and is made necessary for following reasons:

1. Given the impact that the COVID-19 emergency has had on local courts in which counsel for Respondent Defendants have several pending matters, Counsel of Record is currently devoting a substantial amount of time to the management of our clients' evolving needs and case load, specifically by formulating contingency plans for matters with upcoming deadlines and hearings in courts that are operating with limited staff. In light of this, an extension would be beneficial. Additionally, given the alignment of certain interests with the Respondent

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Plaintiffs, who have recently received this same extension, an identical extension on behalf of these Respondent Defendants would assist in keeping this case on a unified timeline among the parties.

2. A 30-day extension will not prejudice Petitioner's interests. Petitioner does not object, and has consented to Respondents' request for this extension. Thirty days is appropriate for this matter.

For the foregoing reasons, Respondents respectfully request a 30-day extension in which to file a brief in opposition.

Regards,

Wilson Elser Moskowitz Edelman & Dicker LLP



Patrick J. Kearns, Esq.  
Counsel of Record  
Wilson Elser Moskowitz Edelman & Dicker LLP  
Email: patrick.kearns@wilsonelser.com

William J. Katt, Esq.  
Wilson Elser Moskowitz Edelman & Dicker LLP  
740 N. Plankinton Avenue, Suite 600  
Milwaukee, Wisconsin 53203  
Telephone: (414) 276-8816  
Facsimile: (414) 276-8819  
Email: william.katt@wilsonelser.com

*Counsel for Respondents*

cc: Carter G. Phillips, *Counsel for Petitioner*  
Robert S. Peck, *Counsel for Respondents*